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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

GALE SOSTEK; and HERB SOSTEK,  
Plaintiff,

vs.

COUNTY OF SAN BERNARDINO;  
SAMUEL FULLER; and DOES 2-10,  
inclusive

Defendants.

Case No. 5:23-cv-02236-MRA-MRW  
*Hon. Mónica Ramírez Almadani*

**JOINT STIPULATION FOR  
ORDER EXTENDING DISCOVERY  
DEADLINES**

[Proposed] Order *filed concurrently  
herewith*

IT IS HEREBY STIPULATED AND REQUESTED by and between the  
parties hereto, through their attorneys of record, as follows:

WHEREAS, the parties conducted a mediation on October 22, 2024.

WHEREAS, the Plaintiffs are submitting a settlement demand that will be  
presented to the County of San Bernardino Board of Supervisors on November 19,  
2024.

WHEREAS, the rebuttal expert disclosures are currently scheduled to be  
exchanged by October 28, 2024 and the expert discovery cut off is November 4,  
2024 (See Doc. # 59).

1 WHEREAS, the parties wish to have their settlement demand presented to the  
2 County Board for decision before incurring the additional substantial expenses  
3 associated with retaining rebuttal experts and with taking the depositions of the  
4 respective experts.

5 WHEREAS, in order to promote the prospects for success of settlement  
6 discussions and limit unnecessary expense, particularly as to the rebuttal expert  
7 retention and the expert depositions, the parties request that the pending controlling  
8 dates set forth in the Court's Scheduling Order be continued by approximately two  
9 weeks after the settlement demand has been presented to the County Board for  
10 approval on November 19, 2024.

11 WHEREAS, there have been two prior requests for continuance or extension  
12 regarding discovery.

13 WHEREAS, such request, if granted, would result in the following schedule:

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<u>EVENT</u>	<u>CURRENT</u>	<u>PROPOSED</u>
Rebuttal Expert Disclosures:	10/28/24	11/29/24
Expert Discovery Cut Off:	11/4/24	12/06/24

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19 7. All other pre-trial and trial dates would remain in effect.  
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5 IT IS SO STIPULATED AND REQUESTED.  
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9 DATED: October 28, 2024

LAW OFFICES OF DALE K. GALIPO

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11 By /s/ Eric Valenzuela  
12 Eric Valenzuela  
13 Attorneys for Plaintiffs  
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15 DATED: October 28, 2024

WESIERSKI & ZUREK LLP

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17 By /s/ Michelle R. Prescott  
18 Michelle R. Prescott  
19 Attorneys for Defendants  
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